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March 14, 2025

## **VIA ELECTRONIC FILING**

Magistrate Judge Miroslav Lovric Northern District of New York Federal Building and U.S. Courthouse 15 Henry Street Binghamton, New York 13901

Re: Status Report

Shara v. Binghamton Precast & Supply Corp.

3:23-cv-00135-LEK-ML

## Dear Judge Lovric:

Please accept this letter as a joint status report following our conference, and text order, of January 21, 2025. As you are aware, I represent the Defendants in this matter and have recently changed law firms. This matter is still in the process of transition and the records associated with this matter are currently inaccessible during the file transition process.

Because of the current status of the transition, it is difficult to assess if the parties will need additional discovery time. The parties remain optimistic we will not need an adjournment, and the parties continue to address discovery issues amicably, but it is too soon to determine if we will need additional time to complete discovery.

As such, the parties request the discovery schedule remain as is for the moment, but may need an additional extension to complete discovery, depending upon how long it takes to have the file completely updated and accessible.

Sincerely,

BOND, SCHOENECK & KING, PLLC

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ADC/cr

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